

THE O'MARA LAW FIRM, P.C.  
DAVID C. OMARA  
(Nevada Bar No. 8599)  
311 East Liberty Street  
Reno, NV 89501  
P: (775) 323-1321  
F: (775) 323-4082  
E: david@omaralaw.net

FIREARMS POLICY COALITION  
ADAM KRAUT\*  
WILLIAM SACK\*  
1215 K Street, 17<sup>th</sup> Floor  
Sacramento, CA 95814  
P: (916) 596-3492  
E: akraut@fpclaw.org  
E: wsack@fpclaw.org

THE DIGUISEPPE LAW FIRM, P.C.  
RAYMOND M. DIGUISEPPE\*  
4320 Southport-Supply Road, Suite 300  
Southport, NC 28461  
P: 910-713-8804  
E: law.rmd@gmail.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ROGER PALMER, *et al.*,  
  
Plaintiffs,  
  
v.  
  
STEPHEN SISOLAK, in his official  
capacity as Governor of Nevada, *et al.*,  
  
Defendants.

Case No.: 3:21-cv-00268

**JOINT STATUS REPORT  
CONCERNING HEARING ON  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

**Judge: Hon. Miranda Du  
Date: July 16, 2021  
Time: 1:30 p.m.  
Courtroom: 5**

Plaintiffs Roger Palmer, Chad Moxley, and Firearms Policy Coalition, and Defendants Stephen Sisolak, Aaron Ford, George Togliatti, Mindy McKay, Joseph Lombardo, Steven Wolfson, Daniel Coverley, and Mark Jackson (collectively the "Parties") hereby submit this Joint Status Report concerning the above-referenced hearing on Plaintiffs' Motion for Preliminary Injunction.

The Parties have met, conferred, and reached the following stipulations and understandings:

None of the Parties will be introducing witness testimony.

Plaintiffs have proffered the exhibits filed with their Designation of Exhibits (Dkt. No. 41), specifically, Declaration of Brandon Combs (Ex. 1; Dkt. No. 41-1), Declaration of Chad Moxley (Ex. 2; Dkt. No. 41-2), Declaration of Roger Palmer (Ex. 3; Dkt. No. 41-3), Declaration of Joseph Greenlee (Ex. 4; Dkt. No. 41-4), and Declaration of Joseph Ostini (Ex. 5; Dkt. No. 41-5). Defendants

do not intend to proffer separate exhibits of their own for purposes of the hearing. State Defendants (Sisolak, Ford, Togliatti, and McKay) request that this Court take judicial notice of the legislative history of AB 286 and State Defendants' citation to various sections of the Federal Register and federal legislative history. *See* FRE 201; *see also Territory of Alaska v. Am. Can Co.*, 358 U.S. 224, 227 (1959) (taking judicial notice of an act's legislative history).

The Parties have stipulated to the admissibility of Exhibits 1, 2, and 3, and to the admissibility of the legislative history of AB 286, reserving the right to dispute the weight or significance of the evidence. They have not stipulated to the admissibility of Exhibit 4 or 5, nor have they stipulated to the admissibility of State Defendants' "citation to various sections of the Federal Register and federal legislative history." Additionally, while Plaintiffs stipulate to judicial notice of the legislative history of AB 286, they object to State Defendants' request for judicial notice of the referenced sections of the Federal Register and federal legislative history as improper.

The Parties have not stipulated to the existence of any undisputed material facts for purposes of the hearing.

Dated: July 13, 2021

THE O'MARA LAW FIRM, P.C.

THE DIGUISEPPE LAW FIRM, P.C.

/s/ David C. O'Mara

/s/ Raymond M. DiGuiseppe

David C. O'Mara, Esq.

Raymond M. DiGuiseppe, Esq.

FIREARMS POLICY COALITION

/s/ Adam Kraut

Adam Kraut, Esq.  
William Sack, Esq.

*Attorneys for Plaintiffs*

AARON D. FORD

MARQUIS AURBACH COFFING

Attorney General

By: /s/ Steve Shevorsi

By: /s/ Nick D. Crosby

Steve Shevorsi, Esq. (Bar No. 8256)

Nick D. Crosby, Esq. (Bar No. 8996)

Chief Litigation Counsel

*Attorneys for Defendant*

Jeffrey M. Conner, Esq. (Bar No. 11543)

*Steven Wolfson*

Deputy Solicitor General

Kiel B. Ireland, Esq. (Bar No. 15368C)

1 Deputy Attorney General  
2 *Attorneys for State Defendants*

3 MARK B. JACKSON  
4 Douglas County District Attorney  
5 By: /s/ Zachary Wadle  
6 Zachary Wadle, Esq. (Bar No. 8711)  
7 *Attorneys for Defendants*  
8 *Daniel Coverley, Sheriff of Douglas County, Nevada*  
9 *Mark Jackson, District Attorney of Douglas County, Nevada*  
10

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that I am an employee of The O'Mara Law Firm, P.C. and on this date, the  
13 foregoing document was filed electronically *via* the Court's ECF system which provided notification  
14 of such filing to counsel of record for all parties.

15 Dated: July 13, 2021

16 /s/ Bryan Snyder  
17 BRYAN SNYDER  
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